

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11935DPW

SHEILA J. PORTER,)
)
Plaintiff,)
)
v.)
)
ANDREA CABRAL, SUFFOLK)
COUNTY SHERIFF'S DEPARTMENT,)
SUFFOLK COUNTY, and)
CORRECTIONAL MEDICAL)
SERVICES, INC.,)
)
Defendants.)

**MOTION OF DEFENDANT, CORRECTIONAL MEDICAL SERVICES, INC.
TO EXTEND TIME IN WHICH DEFENDANT MAY ANSWER PLAINTIFF'S
INTERROGATORIES AND RESPOND TO PLAINTIFF'S REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Now comes the defendant, Correctional Medical Services, Inc. ("CMS"), in the above captioned action and moves this Court to extend the time in which CMS may answer the plaintiff's interrogatories and respond to the plaintiff's requests for production of documents. As reason therefore, CMS states that it has attempted several times without success, both on February 8, 2005 and February 9, 2005, to confer in good faith with counsel for the plaintiff, pursuant to Local Rule 37.1(A), and obtain an extension with which to serve CMS' response to plaintiff's discovery.

CMS' discovery responses were originally due on January 19, 2005. Counsel for CMS then obtained an extension from plaintiff's counsel until February 9, 2005 to respond to plaintiff's discovery requests. CMS is an out-of-state corporation, and it has taken time for it to

gather the necessary information and documents to respond to the plaintiff's interrogatories and document requests. CMS will need an extension until February 23, 2005 in order to answer the plaintiff's discovery.

WHEREFORE the defendant CMS respectfully requests this court to allow its Motion to Extend the Time in Which the Defendant CMS May Answer Plaintiff's Interrogatories and Document Requests.

The Defendant,
CORRECTIONAL MEDICAL SERVICES, INC.,
By its attorneys,

s/Jennifer A. Norton
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